

FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

RQ-2

OCT 18 1995

Robert D. Church, Treasurer Capitol Foundation Campaign Committee P.O. Box 60 Jackson, MS 39205

Identification Number: C00084368

Reference: Mid-Year Report (1/1/95-6/30/95)

Dear Mr. Church:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Please provide a Schedule H3 to support the entry reported on Line 18 of the Datailed Summary Page. All transfers received from a committee's non-federal account for joint activity must be itemized on Schedule H3 regardless of the amount transferred. 2 U.S.C. \$434(b)(3)(D)

-Schedule A of your report, supporting Line 18 of the Detailed Summary Page, discloses a transfer of \$21,954.94 from your Committee's non-federal account. However, your Committee has failed to provide a Schedule H1 containing the administrative/voter drive ratio for the election cycle. In addition, no Schedule H4's have been filed to show the federal and non-federal portion and purpose of the disbursements. Finally, if your Committee participated in any fundraising events during the reporting period, Schedule H2 must be filed to disclose the unique identifying code and ratio for each event.

-The identification of each contributor, including the person's occupation and name of employer, must be provided if the person has contributed in excess of \$200 in the aggregate during the calendar year. Please amend Schedule A supporting Line 11(a)(i) for each entry lacking a contributor's occupation and name of employer.

Note: If your committee has made attempts, either by a written request or by an oral request documented in

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to writing obtain this information from contributor, your committee may have exercised "best efforts." Under revised 11 CFR 104.7(b), such effort shall consist of an initial clear and conspicuous request for the name, mailing address, occupation, and name of employer of each individual who has contributed over \$200 in the calendar year which informs the contributor that the reporting of such information is required by law. If necessary, your committee must make a written follow-up request or an oral follow-up request documented in writing, within thirty days with no additional solicitation. Subsequently, the committee should report any changes provided by the contributor or any additional information which is in the committee's records. If you believe that your committee satisfies the "best efforts" provision, you should provide a copy of your solicitation or an explanation of the method(s) used to obtain contribution information. Clarification regarding "best efforts" should be disclosed during each two year election cycle beginning with the first report filed in the non-election year. 11 CFR \$104.3(a)(4)(i)

-Itemized disbursements must include a brief statement or description of why the disbursements were made. Please amend Schedule B of your report to clarify the following descriptions: miscellaneous. For further guidance regarding acceptable purposes of disbursements, please refer to 11 CFR \$104.3(b)(3).

-Payments made to credit card companies must identify the original vendors from which you have purchased an item or service if your payments to these vendors have exceeded \$200 this year. Please amend your report by providing the date, amount, and purpose of such payments as required by 11 CFR \$104.9(b).

A written response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 219-3580.

Sincerely,

Jan McBride Reports Analyst

Reports Analysis Division

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